



Contemporary/Delta fully supports the Commission's proposals to amend Sections 73.203(b) and 73.3573 of the Commission's Rules, as set forth in the *Notice of Proposed Rule Making*. The changes proposed, if approved, will reduce the amount of time and paperwork involved in securing Commission approval for certain modifications to FM broadcast stations and will speed the implementation of improved FM service to many communities.

As originally proposed, the Commission specified "[w]e also propose to limit this procedure to modifications that require no changes to the Table of Allotments other than a change in the allotment of the station seeking the modification" 1/. However, Contemporary/Delta suggests that the procedures proposed by the Commission should be expanded to include situations in which Station A proposes to upgrade to an adjacent channel, requiring the substitution of Channels for Station B, and in which Station B submits written concurrence with the proposal. Such a procedure would permit the expeditious processing of many upgrade requests, without prejudice to any other party.

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1/ NPRM, paragraph 8.

Contemporary/Delta also suggests that the proposed procedures be applied to non-adjacent channel upgrades. Although the Commission proposed to exempt non-adjacent channel upgrades from the proposed procedure, there is really no reason for doing so. Although non-adjacent channel upgrades are subject to competing expressions of interest, pursuant to Section 1.420(g), such expressions of interest could still be filed by an established cut-off date released on an appropriate Public Notice. This would provide parties who were interested in applying for the channel ample opportunity to express their interest in the non-adjacent channel, or any additional equivalent channel that may be proposed.

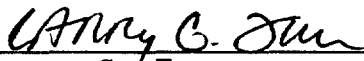
Contemporary/Delta also fully supports the Commission's proposal to apply any changes adopted in this proceeding only to applications filed after the effective date of the rules. To do otherwise would cause disruption in the processing of existing applications and create mass confusion among applicants.

CONCLUSION

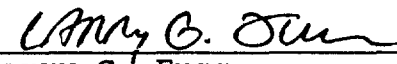
Contemporary/Delta respectfully requests that its comments be considered in this proceeding and that the Commission proceed with the proposed changes, which are clearly in the public interest.

Respectfully submitted,

LARRY G. FUSS, d/b/a  
CONTEMPORARY COMMUNICATIONS

  
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